



Name of Policy: Gift Acceptance Policy and Due Diligence Process

RESPONSIBLE COMMITTEE: Development & Alumni Relations

RESPONSIBLE OFFICER: Principal Bursar

LINKED DOCUMENTS: College: Environmental, Social and Governance Policy, Financial Sanctions Policy

LINKED DOCUMENTS: Other: <https://governance.admin.ox.ac.uk/committee-to-review-donations-and-research-funding>

Annual Review date: First meeting of Hilary Term

Introduction

1. St John's College welcomes philanthropic donations from individuals, public and private sector companies, and other funding entities such as trusts and foundations. Donations play an important part in furthering the College's charitable aims of teaching and research; some of these activities would be greatly diminished without such philanthropy.
2. As a registered charity and also a constituent College of the University of Oxford, St John's is also aware of its position within, and responsibility to, the wider community in which it operates; St John's has a responsibility to ensure that the receipt of donations does not compromise its integrity, reputation, charitable purposes nor the trust of its supporters nor its commitment to its beneficiaries, staff and the wider community.
3. The College therefore realises that it would be prudent to have guidelines in place regarding the acceptance of donations, comprised of a set of specific criteria against which the acceptance of any donation will be assessed, accompanied by more general due diligence principles and practices which ought to be observed.
4. The proposed guidelines rely on best practice within Oxford and, in particular, on the guidelines used by the University's Committee to Review Donations and Research Funding (<https://governance.admin.ox.ac.uk/legislation/committee-to-review-donations-and-research-funding>).

Principles for Accepting Gifts

5. Gifts and pledges must align with the College's charitable objectives, values, and strategic priorities.
6. The College has established an Ethical Donations Advisory Group consisting of the President (Chair), Principal Bursar, Director of Development and two Fellows from the Development and Alumni Relations Committee.



- a) The Advisory Group will meet in person or virtually as required.
 - b) A report for the Advisory Group will be compiled by the fundraiser managing the relationship/gift. The report will include yes/no questions to be answered and may include a recommendation by the fundraiser to conduct further external research through a professional due diligence third party.
 - c) The Advisory Group will vote on whether they intend to accept or reject the gift. This will be recommended to the Development and Alumni Relations Committee and for Governing Body to note.
7. Charity law places certain constraints on charities, and in recommending acceptance of any gift the Director of Development shall make available to the President, Principal Bursar, the Ethical Donations Advisory Group and Governing Body information under the following headings:
- a) Are the purposes of the gift compatible with the purpose of the College as defined in its Statutes?
 - b) Do the purposes of the gift fall within the College's policies and strategic plan?
 - c) What additional costs or burdens, if any, would acceptance of the gift create for the College?
 - d) Is there published evidence that the proposed gift arises in whole or in part from activity that
 - i. evaded taxation
 - ii. violated international conventions that bear on human rights
 - iii. limited freedom of inquiry
 - iv. suppressed or falsified academic research
8. When assessing whether to accept a gift or pledge, the following criteria will be used:
- a) Is there sufficient credible evidence that a proposed donation would originate from an activity which is illegal or which would be considered by the College to be unethical?
 - b) Is there sufficient credible evidence that a proposed donation, or any of its terms, would:
 - i. impinge on academic freedom or limit freedom of enquiry? Noting the College's [Freedom of Speech Policy](#)
 - ii. require or promote activity that is illegal or unethical or which has other serious adverse consequences?
 - iii. create conflicts of interest for St John's or the collegiate University and/or the individual beneficiaries of the donation?
 - iv. do serious harm to the reputation of St John's or the collegiate University?
 - v. seriously harm the relationships between St John's or the collegiate University and other benefactors, partners, staff, students or other stakeholders?
 - c) Where a donor has engaged in activities which led, or would have led, the College not to accept a donation, the College may consider gifts from that donor if such activities have clearly ceased.
 - d) Donations will not generally be accepted if an intermediary negotiates a benefaction on behalf of a donor who asks for complete anonymity. The identity of the donor must at least be known to, and acceptable to, the



President, Principal Bursar, Director of Development, and the Ethical Donations Advisory Group.

- e) In the event that any of these questions cannot be answered satisfactorily the Ethical Donations Advisory Group will recommend that the gift be declined.
- 9. Where a gift or pledge has been accepted, if information subsequently comes to light about the donor or the gift which might have made the gift unacceptable under these guidelines, acceptance of the gift may be reconsidered by the College.
- 10. Although donations will be assessed under these guidelines, irrespective of any previous consideration of the donor, there will be an assumption that, where a gift from a donor has previously been accepted, any subsequent gift will also be approved unless in the interim there has been a change in circumstance which might affect the College's decision as to whether to accept the subsequent gift.
- 11. St John's provides a range of services and benefits to donors, including invitations to events, written and digital communications and access to the College and its members. These activities, benefits and services are provided at the sole discretion of the College, and the College reserves the right to remove access to them. Without limiting the generality of the foregoing, a donor who is convicted of a criminal offence may have their access to these removed either until such time as their conviction is spent, or permanently, at the sole discretion of the College. This might affect the College's decision to accept any subsequent gifts from the donor.
- 12. The College may solicit and/or accept donations from a current student or close family members of current students (parents, legal partners, children, grandparents, step-parents, and former or current legal guardians) providing that all due diligence processes are followed and the College is satisfied that there can be no question of the donor trying to exert influence leading to improper practice and that there is no personal or academic advantage to that student.
 - a) All cases involving donations from a student or close family will require the approval of the Ethical Donations Advisory Group.
 - b) Particular caution should be exercised by the Ethical Donations Advisory Group in the case of donations offered in support of an area of study with which the student is closely associated and, if necessary, a recommendation should be made that acceptance of the donation in question be postponed.
 - c) The Development and Alumni Relations Office and Ethical Donations Advisory Group should maintain complete confidentiality of the student or family's members identity.
- 13. The College does not actively solicit donations from prospective students or any close family member during the period in which an application is live, or likely to become live. During this time, philanthropic conversations with new and existing donors should be paused until after the application cycle has been completed, noting the College's Conflicts of Interest Policy for Undergraduate and Graduate Admissions: <https://www.sjc.ox.ac.uk/discover/about-college/legal/college-policies/>.



14. Any restrictions or conditions attached to gifts and pledges must be clearly documented, lawful, and agreed upon by both the College and the donor.
15. Restricted donations and pledges will be used solely for their agreed purpose. The College reserves the right to refuse any gift that comes with unmanageable restrictions.
16. The College reserves the right to refuse any gift or pledge that does not comply with this policy or which poses undue risk to the College's financial, ethical, or reputational standing.

Due Diligence and Risk Assessment Procedure

17. All gifts and pledges are subject to appropriate due diligence, in compliance with Charity Commission guidelines on risk management. It is the responsibility of the Principal Bursar and Director of Development to ensure that prospective donors are aware of this requirement.
18. The Development and Alumni Relations Committee will receive a list each term of all gifts £50,000 or more for their information.
19. The Director of Development will be able to approve gifts up to £100,000.
20. The Ethical Donations Advisory Group will be required to approve gifts over £100,000 including legacy pledges and donations. For new potential donors of £100,000 or more, the fundraiser managing the relationship will prepare a due diligence report at the point gift discussions start and before a proposal is submitted to the donor.
21. High-risk, high value or unusual gifts, including those from politically exposed persons or non-transparent entities, will require additional scrutiny and may be escalated to the College's Ethical Donations Advisory Group and Governing Body for a final decision on acceptance.
22. Governing Body will be required to approve a philanthropic fellowship for gifts of £5 million or more.
23. The College may seek advice from the University of Oxford Committee for Review of Donations and Research Funding where the Development and Alumni Relations Office has identified potential concerns or risks or the gift is £1million or more.
24. All major donors £1million or more (including cumulative giving) will be reassessed according to the Due Diligence and Risk Assessment process every five years for any new issues.



Ethical Fundraising, Compliance, and Monitoring

25. Fundraising activities will comply with the Fundraising Regulator's Code of Fundraising Practice, maintaining the highest ethical standards.
26. The College ensures that donors are treated with respect, their data is protected under GDPR, and all communications about a donation are treated as confidential unless a donor agrees otherwise.
27. The College will ensure ongoing compliance with Charity Commission guidance, including reporting on significant donations where required.
28. This policy will be reviewed annually by the Development and Alumni Relations Committee or more frequently if required by changes in law or regulatory guidance.



POLICY HISTORY

<i>Date of GB approval</i>	<i>Brief summary of changes</i>	<i>Confirmation that linked documents have updated if necessary</i>	<i>College policy register updated</i>
TT 2026	Policy rewritten, agreed by Committee and approved by GB	Yes	Yes (I Burke)